

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

TANISHA BROWN,

Defendant.

DOCKET NUMBER
DOC# 08
DATE FILED: 08/20/2007

INDICTMENT

07 Cr.

07 CRIM 1110

COUNT ONE

The Grand Jury charges:

1. From in or about July 2005, up to and including in or about February 2006, in the Southern District of New York and elsewhere, TANISHA BROWN, the defendant, unlawfully, willfully, and knowingly, and with intent to defraud, in an offense affecting interstate and foreign commerce, did effect transactions using one and more access devices issued to another person or persons, to receive payment and other things of value during any one-year period the aggregate value of which is equal to or greater than \$1000, to wit, BROWN made numerous unauthorized and fraudulent purchases using the personal information and credit cards of other individuals.

(Title 18, United States Code, Sections 1029(a)(5).)

COUNT TWO

The Grand Jury further charges:

2. From in or about July 2005, up to and including in or about February 2006, in the Southern District of New York and elsewhere, TANISHA BROWN, the defendant, unlawfully, willfully

and knowingly, during and in relation to a felony violation enumerated in subsection (c) of Title 18, United States Code, Section 1028A, did transfer, possess, and use, without lawful authority, means of identification of other persons, to wit, BROWN used the names, addresses, and social security numbers of other individuals in furtherance of the fraud offense charged in Count One of this Indictment.

(Title 18, United States Code, Section 1028A.)

COUNT THREE

The Grand Jury further charges:

3. From in or about August 2006 through in or about December 2006, in the Southern District of New York, TANISHA BROWN, the defendant, unlawfully, willfully, and knowingly, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, the United States Department of Housing and Urban Development ("HUD"), falsified, concealed, and covered up by trick, scheme, and device a material fact, and made materially false, fictitious, and fraudulent statements and representations, and made and used false writings and documents knowing the same to contain materially false, fictitious, and fraudulent statements and entries, to wit, the defendant failed to disclose the receipt of life insurance proceeds in her December 2006 Affidavit of Income.

(Title 18, United States Code, Section 1001.)

FORFEITURE ALLEGATION

AS TO COUNTS ONE THROUGH THREE

4. As a result of committing the offenses alleged in Counts One through Three of this Indictment, TANISHA BROWN, the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982, any property constituting or derived from proceeds obtained directly or indirectly as a result of the credit card fraud and aggravated identity theft offenses.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982 and Title 18, United States Code, Sections 1028A and 1029.)



FOREPERSON



MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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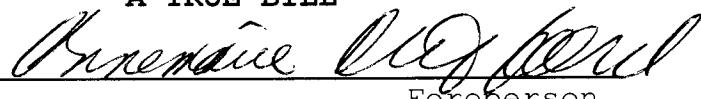
INDICTMENT

07 Cr.

(18 U.S.C. §§ 1029(a)(5), 1028A, and
1001.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

12/5/07

2C
12/5/07
Indictment filed, case assigned to
Judge Koeltl.

J. Maas, USMT